REMARKS

Claims 1, 8, 10, 17, 19, 26, 28, and 35 have been amended.

Applicants had a conversation with Supervisory Patent Examiner (SPE) V. Millin on 08/04/2004 regarding the properness of the restriction requirement. Applicant's calls to, and messages left for, SPE V. Millin on 08/16/2004 and 08/20/2004 in an attempt to obtain SPE Millin's decision on the properness of the restriction requirement were unsuccessful.

Applicants respectfully submit that the restriction is improper as the body of the claims in Group I (claims 1-9 and 19-36) and Group II (claims 10-18) recite the same limitations, differing only by the preamble. For example, below is a side by side comparison of Group I (independent claims 1 and 8) and Group II (independent claims 10 and 17) at the time of the restriction. Claims 1 and 8 are shown on the column on the left, and claims 10 and 17 are shown on the column on the right.

Group I	Group II
1. A method for financial estimation, the method comprising:	10. A computer program product that includes a computer-usable medium, the medium having stored thereon a sequence of instructions which, when executed by a processor, causes the processor to execute a process for financial estimation, said process comprising:
(a) providing a portfolio of financial instruments having a schedule of payment times; (b) generating a plurality of interest rate scenarios by Monte Carlo simulation using a stochastic term structure; (c) calculating, for each financial instrument, a set of financial outcomes using a subset of interest rate scenarios; (d) interpolating, from the sets of financial outcomes, a first function that estimates the aggregate value of the portfolio when sampled at the payment times with an aggregate principal of the portfolio and a first interest rate scenario; (e) providing a second function that estimates a value for a financial instrument from the portfolio when sampled at the payment times using a second interest rate scenario; (f) using an interest rate scenario from the plurality of interest rate scenarios,	(a) providing a portfolio of financial instruments having a schedule of payment times; (b) generating a plurality of interest rate scenarios by Monte Carlo simulation using a stochastic term structure; (c) calculating, for each financial instrument, a set of financial outcomes using a subset of interest rate scenarios; (d) interpolating, from the sets of financial outcomes, a first function that estimates the aggregate value of the portfolio when sampled at the payment times with an aggregate principal of the portfolio and a first interest rate scenario; (e) providing a second function that estimates a value for a financial instrument from the portfolio when sampled at the payment times using a second interest rate scenario; (f) using an interest rate scenario from the plurality of interest rate scenarios,

calculating a value of the second function for each financial instrument in the portfolio and a value of the first function to estimate, respectively, a value for the portfolio and an aggregate value for the portfolio; and (g) forming a control variate based upon the estimated value of the portfolio, the estimated aggregated value of the portfolio, and an expected value of the aggregate value of the portfolio.	calculating a value of the second function for each financial instrument in the portfolio and a value of the first function to estimate, respectively, a value for the portfolio and an aggregate value for the portfolio; and (g) forming a control variate based upon the estimated value of the portfolio, the estimated aggregated value of the portfolio, and an expected value of the aggregate value of the portfolio.
8. A method for financial estimation of a portfolio of financial instruments, the method comprising:	17. A computer program product that includes a computer-usable medium, the medium having stored thereon a sequence of instructions which, when executed by a processor, causes the processor to execute a process for financial estimation of a portfolio of financial instruments, the process comprising:
(a) providing a first function giving an aggregate value for the portfolio; (b) providing a second function giving a value for a financial instrument within the portfolio; (c) using an interest rate scenario, calculating a value for the portfolio using the second function and the aggregate value for the portfolio using the first function; and (d) forming a control variate based upon the value of the portfolio, the aggregate value for the portfolio, and an expected value of the aggregate value for the portfolio.	(a) providing a first function giving an aggregate value for the portfolio; (b) providing a second function giving a value for a financial instrument within the portfolio; (c) using an interest rate scenario, calculating a value for the portfolio using the second function and the aggregate value for the portfolio using the first function; and (d) forming a control variate based upon the value of the portfolio, the aggregate value for the portfolio, and an expected value of the aggregate value for the portfolio.

Note that steps (a) through (g) recite the same limitations in claim 1 (Group I) and claim 10 (Group II), and steps (a) through (d) recite the same limitations in claim 8 (Group I) and claim 17 (Group II).

As the limitations in the body of the claims are the same, the search required would be the same. As such, Applicants respectfully requests that the restriction requirement be withdrawn.

CONCLUSION

On the basis of the above remarks, reconsideration and allowance of the claims is believed to be warranted and such action is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

Respectfully submitted,

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